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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS M. WILCOX
CLERK, U.S. DISTRICT COURT
W.D. OF TN MEMPHIS

ARON LAMBERT

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

HMS INCORPORATED (THE SAISON AFFAIRS)
ERICA SMITH

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, ARON LAMBERT
(name of plaintiff)

is a citizen of the United States and resides at 1437 CENTRAL AVE, APT 1111
(street address)

MEMPHIS U.S.A. TENNESSEE
(city) (country) (state)

38104 901-654-7418
(zip code) (telephone number)

3. Defendant AMB INCORPORATED (TAE SALON AT MACY'S)
(defendant's name)
 lives at, or its business is located at 4545 POPLAR AVE
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
4545 POPLAR AVE
(street address)
MEMPHIS U.S.A. TENNESSEE 38117
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about THE 23RD OF APRIL 2012
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about THE 26TH OF APRIL 2012
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 26 JULY 2012. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) _____ race, (2) _____ color, (3) X sex, (4) _____ religion, (5) _____ national origin, defendant

(a) X failed to employ plaintiff.

(b) _____ terminated plaintiff's employment.

(c) _____ failed to promote plaintiff.

(d) X FAILED TO ISSUE AN APPLICATION OF EMPLOYMENT

10. The circumstances under which defendant discriminated against plaintiff were as follows: THE DEFENDANT NOT ONLY DENIED THE PLAINTIFF AN APPLICATION FOR CONSIDERATION, BUT SHE ALSO STATED VERBALLY "I NEED A GIRL IN COLLEGE WITH EXPERIENCE IN WORK", WHICH IS A DIRECT VIOLATION OF MY RIGHT AS AN INTERESTED APPLICANT TO RECEIVE AN APPLICATION TO BE A RECEPTIONIST AS WELL AS THE TITLE VII OF THE CIVIL RIGHTS ACT OF 1964. DURING MEDIATION WITH THE EEOC, THE MANAGER OF HIMS, ERICA SMITH, STANDARDED MY NAME IN FRONT OF THE MEDIATOR AS WELL AS MY ATTORNEY.

11. The acts set forth in paragraph 9 of this complaint

- (a) ____ are still being committed by defendant.
- (b) ____ are no longer being committed by defendant.
- (c) ____ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ____ Defendant be directed to employ plaintiff, or
- (b) ____ Defendant be directed to re-employ plaintiff, or
- (c) ____ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to compensate plaintiff for discrimination on the basis of sex, pain and suffering, and mental anguish

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes () No ☒

A. Hamblett
SIGNATURE OF PLAINTIFF